

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

Timothy S. Lack

) Case Number: 16-1017-JPG  
(Clerk's Office will provide)

Plaintiff/Petitioner(s)

CIVIL RIGHTS COMPLAINT  
pursuant to 42 U.S.C. §1983 (State Prisoner)

v.  
Alton P.d. officers  
Joel C. Bromaghim, Michael Beaber  
Brian Brenner, Stephen January  
Steven Basew  
Defendant/Respondent(s)

CIVIL RIGHTS COMPLAINT  
pursuant to 28 U.S.C. §1331 (Federal Prisoner)  
 CIVIL COMPLAINT  
pursuant to the Federal Tort Claims Act,  
28 U.S.C. §§1346, 2671-2680, or other law

Amended Complaint

I. JURISDICTION

Plaintiff:

- A. Plaintiff's mailing address, register number, and present place of confinement.

Timothy S. Lack  
Danville C.C.  
3820 E. Main St  
Danville IL 61834

Defendant #1:

- B. Defendant Joel C. Bromaghim is employed as

(a) (Name of First Defendant)

Alton P.d. officer

(b) (Position/TITLE)

with 1700 E. Broadway Alton P.d.

(c) (Employer's Name and Address)

Alton IL 62002

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government?  Yes  No

If your answer is YES, briefly explain:

Alton City Police  
officer Alton, IL

Defendant #2:

C. Defendant Michael Beaber is employed as

(Name of Second Defendant)

Alton P.d. officer

(Position/Title)

with Alton P.d. 1700 E. Broadway  
(Employer's Name and Address)

Alton IL 62002

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government?  Yes  No

If you answer is YES, briefly explain:

alton City Police  
officer alton, Ic

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).

Defendant #3 - Brian Brenner  
(Position/title) Alton Police officer

Defendant #4 - Stephen January  
(Position/title) Alton Police officer

Defendant #5 - Steven Bosaw  
(Position/title) Alton Police officer

Defendant #3, 4, 5 Employed by  
Alton Pd. 1700 E. Broadway

**II. PREVIOUS LAWSUITS**

- A. Have you begun any other lawsuits in state or federal court relating to your imprisonment?  Yes  No
- B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits:

Plaintiff(s):

Defendant(s):

2. Court (if federal court, name of the district; if state court, name of the county):
3. Docket number:
4. Name of Judge to whom case was assigned:
5. Type of case (for example: Was it a habeas corpus or civil rights action?):
6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?):
7. Approximate date of filing lawsuit:
8. Approximate date of disposition:

III. GRIEVANCE PROCEDURE

A. Is there a prisoner grievance procedure in the institution?  Yes  No

B. Did you present the facts relating to your complaint in the prisoner grievance procedure?  Yes  No

C. If your answer is YES,

1. What steps did you take?

filed grievances at Graham and Danville relating to injuries occurring on April 21, 2016

2. What was the result?

None, blown me off, said find doctor when get out, ~~making jokes~~, ~~at time~~

D. If your answer is NO, explain why not.

~~making jokes~~  
~~at time~~  
To short of  
Time, injuries healed  
nothing they could do

E. If there is no prisoner grievance procedure in the institution, did you

complain to prison authorities?

Yes  No

F. If your answer is YES,

1. What steps did you take?

Grievances at D.O.C sent through Springfield

2. What was the result?

None, blown me off said find doctor when I get home, to short of Time

G. If your answer is NO, explain why not.

H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

250,000 plus all medical  
issues covered

VI. JURY DEMAND (check one box below)

The plaintiff  does  does not request a trial by jury.

**DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11**

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: Nov 14, 2016

(date)

Timothy S. Lack

Signature of Plaintiff

3820 East Main St

Street Address

Timothy S. Lack

Printed Name

Danville IL 61834

City, State, Zip

#S05193

Prisoner Register Number

\_\_\_\_\_  
Signature of Attorney (if any)

On April 21<sup>st</sup> Alton Pd arrived at my home of 3233 theresa st. Alton IL. I had a warrant of criminal trespass and domestic for my arrest. Alton P.d. Knocked at my door 2-3 times. I didn't answer. They didn't say they was kicking door in. They did. I had hands up was seated. They released K-9 dog. The dog attacked me while seated. Bit me on left outer calf, left inner thigh close to private. I have many scars. K-9 dog attached to me. I was half on couch and floor. K-9 officer tazred me in chest instead of grabbing me and cuffing me. Two or three officers started striking me in face, head, neck, back, kicking me, stomped me, stomped left elbow right hand, left ankle. I had no guns, drugs ect. to explain this type of force. Didn't get up to run or fight or anything of that nature. I heard one of them state'n that they got me alone this time. They was at my house in March on domestic charge. This was approximately noon on 21<sup>st</sup>. They struck me so much they Knocked me out for period of time. I have had

left eye issues, bad pain in left elbow and hand to this day. Rt collar bone area and neck been in pain. They cracked numerous bones I believe. Numbness in upper legs from knee to hips and in lower back, plus pain. I've had black out spells, dizziness, headaches, lazy eye feelings. From April 21<sup>st</sup> to end of June it was really bad. July to present is little better but still have issues with legs, back, eye, discomfort in elbow, hand, neck and collar bone area. I told nurses at Madison County about problems I was having. They only addressed dog bites and X-ray on elbow and hand and said I was getting old. Alton P.D. rushed me in and out of ~~the~~ Alton Memorial hospital I don't think they was aware of all injuries. I had knots on head, black eye that you could tell I took head shots. They transferred me to Doc on Warrents on May 12<sup>th</sup> 2016.

This excessive force was uncalled for. I was seated hands up. The officers involved ~~was~~ is Joel C Bromaghin, Michael Beaver, Brian Brenner, Stephen January, Steven Bosaw. All are Alton P. d. officers